

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CIVIL ACTION NO. 1:19-CV-1126

KATHERINE GUILL, et al.,

Plaintiffs;

v.

BRADLEY R. ALLEN, SR., in his
official capacity as chief district judge,
et al.,

Defendants.

**AFFIDAVIT OF STEVEN
YOUNG**

My name is Steven Young. I declare under oath that I am over eighteen (18) years of age and under no disability which would interfere with my ability to be truthful and honest.

I declare that, to the best of my knowledge and belief, the information contained herein is true, correct and complete. Under penalty of perjury, I do attest and aver to the following:

1. I am currently employed as a Major in charge of the Alamance County Detention Center. I have worked in the Alamance County Detention Center in various roles since October 10, 2005. In my current role of Major, I oversee all operations of the Alamance County Detention Center and report directly to Sheriff Johnson.

2. I do not have, nor have I ever had, any supervisory role over any magistrate or judicial official. No one at the Alamance County Detention Center has any role in setting policies for or supervising magistrates or other judicial officials.
3. Employees of the Alamance County Detention Center do not determine conditions of release for any individual.
4. In his role as keeper of the Alamance County Detention Center, Sheriff Johnson maintains an interest in his jail population. Under Sheriff Johnson's direction, the Alamance County Detention Center supports initiatives such as Alamance Steps Up which are designed to identify individuals who may need special attention, including modification of conditions of release. However, initiatives such as Alamance Steps Up do not authorize Sheriff Johnson or any member of Alamance County Detention Center staff to modify any conditions of release. All modifications must be made by an authorized judicial official.
5. Prior to the filing of this lawsuit, Sheriff Johnson had directed the Alamance County Detention Center to accept the North Carolina Administrative Office of the Courts form entitled "Conditions of Release and Release Order," also known by the number AOC-CR-200. This form was not prepared by and is not updated by the Alamance County Detention Center. It is a state form. A blank copy of this form is attached as Exhibit "A" to this Declaration.
6. After the implementation of the 2020 Bond Policy revisions to the judicial process determining conditions of release, Sheriff Johnson has directed the Alamance

County Detention Center to continue to comply with the new procedures adopted by judicial officials in Alamance County.

7. For the named Plaintiff to this lawsuit, a Conditions of Release and Release Order was prepared by a judicial official and submitted to the Alamance County Detention Center by a law enforcement officer. A copy of this form is attached as Exhibit "B" to this Declaration.
8. Sheriff Johnson and the Alamance County Detention Center have fully complied with the requirements of the Consent Order for Preliminary Injunction issued in this case. Additionally, Sheriff's Office personnel have worked diligently to provide the requested public records, including voluntarily writing a computer application to automate the records production process.

I have reviewed this declaration and it is true to the best of my knowledge.

I make this declaration under oath.

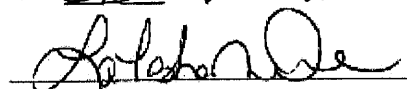
Further affiant saith not.

This the 22nd day of July, 2022.


Steven Young

Alamance COUNTY, NORTH CAROLINA

Sworn to and subscribed before me by Steven Young
this 22nd day of July, 2022.



Official Signature of Notary

LATASHA MEBANE, Notary Public
[Print name]

My commission expires: 1/13/2027

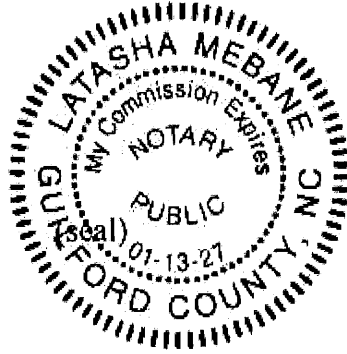


EXHIBIT A

STATE OF NORTH CAROLINA		File No. 	
County _____		In The General Court Of Justice <input type="checkbox"/> District <input type="checkbox"/> Superior Court Division	
STATE VERSUS		CONDITIONS OF RELEASE AND RELEASE ORDER	
Name And Address Of Defendant			
Offenses And Additional File Numbers		# _____ G.S. Chapter 15A, Art. 25, 26 Amount Of Bond \$ _____	
Location Of Court		<input type="checkbox"/> District <input type="checkbox"/> Superior Date _____ Time _____ <input type="checkbox"/> AM <input type="checkbox"/> PM	
<p>To The Defendant Named Above, you are ORDERED to appear before the Court as provided above and at all subsequent continued dates. If you fail to appear, you will be arrested and you may be charged with the crime of willful failure to appear. You also may be arrested without a warrant if you violate any condition of release in this Order or in any document incorporated by reference.</p> <p>The defendant has been advised of charge(s) against him/her and his/her right to communicate with counsel and friends.</p> <p><input type="checkbox"/> Your release is authorized upon execution of your: <input type="checkbox"/> WRITTEN PROMISE to appear <input type="checkbox"/> UNSECURED BOND in the amount shown above <input type="checkbox"/> CUSTODY RELEASE <input type="checkbox"/> SECURED BOND in the amount shown above (NOTE: Give a copy of this order to any surety who posts bond.) <input type="checkbox"/> HOUSE ARREST with ELECTRONIC MONITORING administered by (agency) _____ and the SECURED BOND above. You may leave your residence for the purpose(s) of <input type="checkbox"/> employment <input type="checkbox"/> counseling <input type="checkbox"/> course of study <input type="checkbox"/> vocational training</p> <p><input type="checkbox"/> Your release is not authorized.</p> <p><input type="checkbox"/> The defendant is required to provide (check all that apply) <input type="checkbox"/> fingerprints under G.S. 15A-502. <input type="checkbox"/> a DNA sample under G.S. 15A-266.3A. Prior to release, the defendant shall provide his/her (check all that apply) <input type="checkbox"/> fingerprints. <input type="checkbox"/> DNA sample.</p> <p><input type="checkbox"/> The defendant has been <input type="checkbox"/> (i) charged with a felony while on probation (complete AOC-CR-272, Side One). <input type="checkbox"/> (ii) arrested for violation of probation with a pending felony charge or prior conviction requiring registration under G.S. 14, Article 27A (complete AOC-CR-272, Side Two).</p> <p><input type="checkbox"/> This Order is entered upon defendant's warrantless arrest for violation of conditions of release entered previously for the above-captioned case in the Order dated _____.</p> <p><input type="checkbox"/> The defendant was arrested or surrendered after failing to appear as required under a prior release order.</p> <p><input type="checkbox"/> This was the defendant's second or subsequent failure to appear in this case.</p> <p><input type="checkbox"/> Your release is subject to the conditions as shown on the attached <input type="checkbox"/> AOC-CR-270. <input type="checkbox"/> Other: _____.</p>			
Additional Information			
Date		Signature Of Judicial Official _____ <input type="checkbox"/> Magistrate <input type="checkbox"/> Deputy CSC <input type="checkbox"/> Assistant CSC <input type="checkbox"/> Clerk Of Superior Court <input type="checkbox"/> District Court Judge <input type="checkbox"/> Superior Court Judge	
ORDER OF COMMITMENT			
<p>To The Custodian Of The Detention Facility Named Below, you are ORDERED to receive in your custody the defendant named above who may be released if authorized above. If the defendant is not sooner released, you are ORDERED to: <input type="checkbox"/> produce him/her in Court as provided above. <input type="checkbox"/> hold him/her <input type="checkbox"/> as provided on the attached AOC-CR-272. <input type="checkbox"/> for the following purpose: _____.</p> <p><input type="checkbox"/> [for charges covered by G.S. 15A-534.1 (domestic violence) or 15A-534.7 (threat of mass violence)] produce him/her at the first session of District or Superior Court held in this county after the entry of this Order or, if no session is held before (enter date and time 48 hours after time of arrest) _____, _____ <input type="checkbox"/> AM <input type="checkbox"/> PM produce him/her before a magistrate of this county at that time to determine conditions of pretrial release.</p>			
Name Of Detention Facility		Date Signature Of Judicial Official	
WRITTEN PROMISE TO APPEAR OR CUSTODY RELEASE			
<p>I, the undersigned, promise to appear at all hearings, trials or otherwise as the Court may require and to abide by any restrictions set out above. I understand and agree that this promise is effective until the entry of judgment in the District Court from which no appeal is taken or until the entry of judgment in Superior Court. If I am released to the custody of another person, I agree to be placed in that person's custody, and that person agrees by his/her signature to supervise me.</p>			
Date		Signature Of Defendant Signature Of Person Agreeing To Supervise Defendant	
Name Of Person Agreeing to Supervise Defendant (type or print)		Address Of Person Agreeing To Supervise Defendant	
DEFENDANT RELEASED ON BAIL			
Date		Time <input type="checkbox"/> AM <input type="checkbox"/> PM Signature Of Jailer	

CONDITIONS OF RELEASE MODIFICATIONS

The Conditions of Release on the reverse are modified as follows:

Modification	Date	Signature Of Judicial Official

SUPPLEMENTAL ORDERS FOR COMMITMENT

The defendant is next Ordered produced in Court as follows:

Date	Time	Place	Purpose	Signature Of Judicial Official

DEFENDANT RECEIVED BY DETENTION FACILITY

Date	Time	Signature Of Jailer

DEFENDANT RELEASED FOR COURT APPEARANCE


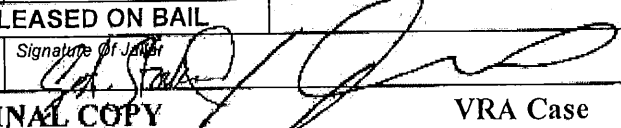
Date	Time	Signature Of Jailer

NOTE TO CUSTODIAN: This form shall accompany the defendant to court for all appearances.

AOC-CR-200, Side Two, Rev. 12/18

© 2018 Administrative Office of the Courts

EXHIBIT B

STATE OF NORTH CAROLINA		File No. 19CR 056559		
ALAMANCE County		In The General Court Of Justice <input checked="" type="checkbox"/> District <input type="checkbox"/> Superior Court Division		
STATE VERSUS		CONDITIONS OF RELEASE AND RELEASE ORDER		
Name And Address Of Defendant KATHERINE ROARK GUILL 112 COVINGTON D4R CHAPEL HILL NC				
		# 19RO1374787 Amount Of Bond \$ 2,500.00		G.S. Chapter 15A, Art. 25, 26
Offenses And Additional File Numbers 19CR56559 MAG ORDR; M-ASSAULT GOVT OFFICIAL/EMPLY; M-RESISTING PUBLIC OFFICER; M-SECOND DEGREE TRESPASS				
<input type="checkbox"/> See Attachment				
Location Of Court Alamance County Courthouse; CRMA		<input checked="" type="checkbox"/> District <input type="checkbox"/> Superior	Date 12/10/2019	Time 09:00 <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM
<p>To The Defendant Named Above, you are ORDERED to appear before the Court as provided above and at all subsequent continued dates. If you fail to appear, you will be arrested and you may be charged with the crime of willful failure to appear. You also may be arrested without a warrant if you violate any condition of release in this Order or in any document incorporated by reference.</p> <p>The defendant has been advised of charge(s) against him/her and his/her right to communicate with counsel and friends.</p> <p><input checked="" type="checkbox"/> Your release is authorized upon execution of your: <input type="checkbox"/> WRITTEN PROMISE to appear <input type="checkbox"/> UNSECURED BOND in the amount shown above</p> <p> <input type="checkbox"/> CUSTODY RELEASE <input checked="" type="checkbox"/> SECURED BOND in the amount shown above (NOTE: Give a copy of this order to any surety who posts bond.) <input type="checkbox"/> HOUSE ARREST with ELECTRONIC MONITORING administered by (agency) _____ and the SECURED BOND above. You may leave your residence for the purpose(s) of <input type="checkbox"/> employment <input type="checkbox"/> counseling <input type="checkbox"/> course of study <input type="checkbox"/> vocational training </p> <p> <input type="checkbox"/> Your release is not authorized. <input type="checkbox"/> The defendant is required to provide (check all that apply) <input type="checkbox"/> fingerprints under G.S. 15A-502. <input type="checkbox"/> a DNA sample under G.S. 15A-266.3A. Prior to release, the defendant shall provide his/her (check all that apply) <input type="checkbox"/> fingerprints. <input type="checkbox"/> DNA sample. <input type="checkbox"/> The defendant has been <input type="checkbox"/> (i) charged with a felony while on probation (complete AOC-CR-272, Side One). <input type="checkbox"/> (ii) arrested for violation of probation with a pending felony charge or prior conviction requiring registration under G.S. 14, Article 27A (complete AOC-CR-272, Side Two). <input type="checkbox"/> This Order is entered upon defendant's warrantless arrest for violation of conditions of release entered previously for the above-captioned case in the Order dated _____. <input type="checkbox"/> The defendant was arrested or surrendered after failing to appear as required under a prior release order. <input type="checkbox"/> This was the defendant's second or subsequent failure to appear in this case. <input type="checkbox"/> Your release is subject to the conditions as shown on the attached <input type="checkbox"/> AOC-CR-270. <input type="checkbox"/> Other: _____ </p>				
Additional Information				
Date 11/11/2019	Signature Of Judicial Official JOHN P WATTERSON		<input checked="" type="checkbox"/> Magistrate <input type="checkbox"/> Deputy CSC <input type="checkbox"/> Assistant CSC <input type="checkbox"/> Clerk Of Superior Court <input type="checkbox"/> District Court Judge <input type="checkbox"/> Superior Court Judge	
ORDER OF COMMITMENT				
<p>To The Custodian Of The Detention Facility Named Below, you are ORDERED to receive in your custody the defendant named above who may be released if authorized above. If the defendant is not sooner released, you are ORDERED to: <input checked="" type="checkbox"/> produce him/her in Court as provided above.</p> <p> <input type="checkbox"/> hold him/her <input type="checkbox"/> as provided on the attached AOC-CR-272. <input type="checkbox"/> for the following purpose: _____ </p> <p> <input type="checkbox"/> [for charges covered by G.S. 15A-534.1 (domestic violence) or 15A-534.7 (threat of mass violence)] produce him/her at the first session of District or Superior Court held in this county after the entry of this Order or, if no session is held before (enter date and time 48 hours after time of arrest) _____ <input type="checkbox"/> AM <input type="checkbox"/> PM produce him/her before a magistrate of this county at that time to determine conditions of pretrial release. </p>				
Name Of Detention Facility Alamance County Jail		Date 11/11/2019	Signature Of Judicial Official JOHN P WATTERSON	
WRITTEN PROMISE TO APPEAR OR CUSTODY RELEASE				
I, the undersigned, promise to appear at all hearings, trials or otherwise as the Court may require and to abide by any restrictions set out above. I understand and agree that this promise is effective until the entry of judgment in the District Court from which no appeal is taken or until the entry of judgment in Superior Court. If I am released to the custody of another person, I agree to be placed in that person's custody, and that person agrees by his/her signature to supervise me.				
Date	Signature Of Defendant		Signature Of Person Agreeing To Supervise Defendant	
Name Of Person Agreeing To Supervise Defendant (type or print)			Address Of Person Agreeing To Supervise Defendant	
DEFENDANT RELEASED ON BAIL				
Date 11-13-19	Time 1400	<input type="checkbox"/> AM <input checked="" type="checkbox"/> PM	Signature Of Judge 	
AOC-CR-200, Rev. 12/18 © 2018 Administrative Office of the Courts				

ORIGINAL COPY

VRA Case

STATE OF NORTH CAROLINA

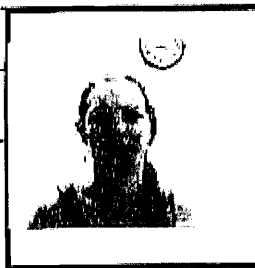
ORANGE for ALAMANCE County

File No.

19CR 056559

In The General Court Of Justice

☒ District ☐ Superior Court Division



STATE VERSUS

Name And Address Of Defendant

KATHERINE ROARK GUILL
320 HOLT RD

CONDITIONS OF RELEASE AND RELEASE ORDER

GRAHAM

NC

27253

21RO991347

G.S. Chapter 15A, Art. 25, 26

Amount Of Bond

\$ 5,000.00

Offenses And Additional File Numbers

19CR56559 OFA;FTA RO 2ND;09/14/2021; M-ASSAULT GOVT OFFICIAL/EMPLY; M-RESISTING PUBLIC OFFICER; M-SECOND DEGREE TRESPASS

☐ See Attachment

Location Of Court

Alamance County Courthouse; CRMB

☒ District ☐ Superior

Date

11/09/2021

Time

09:00

☒ AM

☐ PM

To The Defendant Named Above, you are ORDERED to appear before the Court as provided above and at all subsequent continued dates. If you fail to appear, you will be arrested and you may be charged with the crime of willful failure to appear. You also may be arrested without a warrant if you violate any condition of release in this Order or in any document incorporated by reference.

The defendant has been advised of charge(s) against him/her and his/her right to communicate with counsel and friends.

☒ Your release is authorized upon execution of your: ☐ WRITTEN PROMISE to appear ☐ UNSECURED BOND in the amount shown above

☐ CUSTODY RELEASE ☒ SECURED BOND in the amount shown above (NOTE: Give a copy of this order to any surety who posts bond.)

☐ HOUSE ARREST with ELECTRONIC MONITORING administered by (agency) _____ and the SECURED BOND above. You may leave your residence for the purpose(s) of ☐ employment ☐ counseling ☐ course of study ☐ vocational training

☐ Your release is not authorized.

☐ The defendant is required to provide (check all that apply) ☐ fingerprints under G.S. 15A-502. ☐ a DNA sample under G.S. 15A-266.3A.

Prior to release, the defendant shall provide his/her (check all that apply) ☐ fingerprints. ☐ DNA sample.

☐ The defendant has been ☐ (i) charged with a felony while on probation (complete AOC-CR-272, Side One). ☐ (ii) arrested for violation of probation with a pending felony charge or prior conviction requiring registration under G.S. 14, Article 27A (complete AOC-CR-272, Side Two).

☐ This Order is entered upon defendant's warrantless arrest for violation of conditions of release entered previously for the above-captioned case in the Order dated _____.

☒ The defendant was arrested or surrendered after failing to appear as required under a prior release order.

☒ This was the defendant's second or subsequent failure to appear in this case.

☐ Your release is subject to the conditions as shown on the attached ☐ AOC-CR-270. ☐ Other: _____

Additional Information

Date

09/22/2021

Signature Of Judicial Official

S M LYNN

☒ Magistrate ☐ Deputy CSC ☐ Assistant CSC

☐ Clerk Of Superior Court ☐ District Court Judge ☐ Superior Court Judge

ORDER OF COMMITMENT

To The Custodian Of The Detention Facility Named Below, you are ORDERED to receive in your custody the defendant named above who may be released if authorized above. If the defendant is not sooner released, you are ORDERED to: ☒ produce him/her in Court as provided above.

☐ hold him/her ☐ as provided on the attached AOC-CR-272. ☐ for the following purpose: _____

☐ [for charges covered by G.S. 15A-534.1 (domestic violence) or 15A-534.7 (threat of mass violence)] produce him/her at the first session of District or Superior Court held in this county after the entry of this Order or, if no session is held before (enter date and time 48 hours after time of arrest) _____

☐ AM ☐ PM produce him/her before a magistrate of this county at that time to determine conditions of pretrial release.

Name Of Detention Facility

Orange County Jail

Date

09/22/2021

Signature Of Judicial Official

S M LYNN

WRITTEN PROMISE TO APPEAR OR CUSTODY RELEASE

I, the undersigned, promise to appear at all hearings, trials or otherwise as the Court may require and to abide by any restrictions set out above. I understand and agree that this promise is effective until the entry of judgment in the District Court from which no appeal is taken or until the entry of judgment in Superior Court. If I am released to the custody of another person, I agree to be placed in that person's custody, and that person agrees by his/her signature to supervise me.

Date

Signature Of Defendant

Signature Of Person Agreeing To Supervise Defendant

Name Of Person Agreeing to Supervise Defendant (type or print)

Address Of Person Agreeing To Supervise Defendant

DEFENDANT RELEASED ON BAIL

Date

11/09/2021

Time

1:35

☐ AM

☐ PM

Signature Of Jailer

[Signature]

AOC-CR-200, Rev. 12/18

© 2018 Administrative Office of the Courts

ORIGINAL COPY

VRA Case

